

ANDREA VALDEZ (Cal. Bar No. 239082)  
530 S. Lake Avenue, No. 574  
Pasadena, CA 91101  
Tel: (626) 817-6547  
andrea.valdez.esq@gmail.com

JOSEPH SCOTT ST. JOHN (*pro hac vice*)  
514 Mockingbird Drive  
Long Beach, MS 39560  
Tel: 410-212-3475  
jscottstjohnpublic@gmail.com

*Attorneys for Objector Douglas W. St. John*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 JST

MDL No. 1917

**DECLARATION OF ATTORNEY  
JOSEPH SCOTT ST. JOHN  
IN SUPPORT OF OBJECTOR  
DOUGLAS W. ST. JOHN'S MOTION  
TO AMEND THE ORDER  
APPOINTING S.M. QUINN**

This Document Relates To:  
All Indirect Purchaser Actions

Judge: Hon. Jon S. Tigar

1 I, Joseph Scott St. John, declare and state as follows:

2 1. I am an attorney duly licensed in the State of Mississippi, the State of Louisiana, and  
3 the District of Columbia. I represent Douglas W. St. John, a resident of the State of Mississippi, in  
4 connection with the above-captioned matter.

5 2. I make this declaration in support of Objector Douglas W. St. John's Motion to  
6 Amend the Order Appointing Special Master Quinn.

7 3. I have personal knowledge of the facts stated herein, and if called and sworn as a  
8 witness, I would testify truthfully as follows.

9 4. Exhibit 1 is a true and correct copy of correspondence sent by me to IPP Lead  
10 Counsel Mario Alioto.

11 5. Exhibit 2 is a true and correct copy of correspondence sent by me to IPP Lead  
12 Counsel Mario Alioto.

13 6. Composite Exhibit 3 is a true and correct copy of an email I received from IPP Lead  
14 Counsel Mario Alioto, together with a document attached to that email.

15 7. Exhibit 4 is a true and correct copy of the Amended Order Appointing Martin  
16 Quinn as Special Master (D.E. 6580), *In re TFT-LCD (Flat Panel) Antitrust Litigation*, No. MDL-1827  
17 (N.D. Cal. Aug. 29, 2012), as downloaded from PACER.

18 8. Exhibit 5 is a true and correct copy of an email chain between me and IPP Lead  
19 Counsel Mario Alioto.

20 9. Exhibit 6 is a true and correct copy of a Motion for Discovery that I prepared on  
21 behalf of Mr. St. John. This motion was in condition for filing on November 18.

22 10. Given the relatively small size of Mr. St. John's claim, it did not make economic  
23 sense for Mr. St. John to file the Motion for Discovery if there was any material risk of his being  
24 subject to Special Master fees.

25 11. Exhibit 7 is a declaration that I prepared in support of Mr. St. John's contemplated  
26 Motion for Discovery, together with exhibits. This declaration was in condition for filing on  
27 November 18.  
28

1           12.     Exhibit 8 is a proposed order that I prepared in connection with Mr. St. John's  
2 contemplated Motion for Discovery. This proposed order was in condition for filing on November  
3 18.

4           13.     Exhibit 9 is a true and correct copy of an Order (D.E. 116), *Morgan Hill Concerned*  
5 *Parents Ass'n v. Cal. Dep't Ed.*, No. 11-3471-KJM-AC (E.D. Cal. July 2, 2015), as downloaded from  
6 PACER.

7           14.     Further declarant sayeth not.

8 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED  
9 STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

10  
11 Executed: November 20, 2015

12                               /s/ Joseph Scott St. John

13                               \_\_\_\_\_  
14 Joseph Scott St. John  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28